

## **Exhibit E**

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**IN RE: NATIONAL COLLEGIATE  
ATHLETIC ASSOCIATION STUDENT-  
ATHLETE CONCUSSION LITIGATION**

MDL NO. 2492  
Case No. 13-cv-09116

Judge John Z. Lee

**DECLARATION OF JOSEPH J. DEPALMA IN SUPPORT OF  
PETITION FOR FEES AND EXPENSES**

I, Joseph J. DePalma, declare as follows:

1. I am Managing Member of the firm Lite DePalma Greenberg, LLC. I represent Plaintiffs Chris Walker, Ben Martin, and Dan Ahern in the above-entitled action. I am submitting this declaration in support of my firm's application for an award of attorneys' fees and expenses in connection with services rendered in the above-entitled action.

2. My firm and the Plaintiffs we represent support the Settlement in this matter.

3. My firm first became involved with the litigation in August, 2013. From the inception of our work in this litigation, counsel for plaintiffs have aggressively prosecuted this case and vigorously represented the best interests of plaintiffs and the Class.

4. My firm's work was directed at assuring the scope of the medical monitoring relief included older former players and testing for late-life cognitive impairment. My firm contributed to the complaints, gathered information from class members, worked on issues related to counsel organization, class certification and mediation, NCAA discovery materials, attended hearings and settlement.

5. Through December 31, 2016, the total number of hours spent on this litigation by my firm was 197.40. The total lodestar amount for attorney/professional time based on the

firm's current rates is \$145,832.50. The hourly rates shown below are the usual and customary rates charged for each individual in all of our cases. A breakdown of the lodestar is as follows:

<b>NAME</b>	<b>HOURS</b>	<b>RATE</b>	<b>LODESTAR</b>
Joseph J. DePalma, Managing Member	96.3	\$800	77,040.00
Katrina Carroll, Member	38.1	\$800	30,480.00
Victor A. Afanador, Member	1.6	\$800	1,280.00
Bruce D. Greenberg, Member	.5	\$800	400.00
Susana Cruz Hodge, Member	.2	\$750	150.00
Steven J. Greenfogel, Counsel	21.7	\$800	17,360.00
Jeffrey J. Shooman, Associate	25.9	\$550	14,245.00
Kyle A. Shamberg, Associate	4.6	\$525	2,415.00
Erik E. Sardina, Associate	2.7	\$375	1,012.50
Amina B. Lee, Paralegal	4.4	\$250	1,100.00
Eric M. Henley, Paralegal	1.4	\$250	350.00
<b>TOTAL:</b>	<b>197.4</b>		<b>\$145,832.50</b>

6. My firm incurred a total of \$2,902.65 in expenses in connection with the prosecution of this litigation. They are broken down as follows:

<b>EXPENSE CATEGORY</b>	<b>TOTAL</b>
Meals, Hotels & Transportation	2,258.35
Photocopies	68.86
Postage	22.30
Telephone, Facsimile	0
Messenger, Overnight Delivery	128.77
Filing, Witness & Other Fees	276.00
Court Reporters	47.70
Lexis, Westlaw, Online Library Research	100.67
Class Action Notices/Business Wire	0
Mediation Fees	0
Experts/Consultants/Investigators	0
<b>TOTAL</b>	<b>\$2,902.65</b>

7. The expenses pertaining to this case are reflected in the books and records of this firm. These books and records are prepared from expense vouchers, check records, and other documents and are an accurate record of the expenses.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 5th day of January, 2017

  
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Joseph J. DePalma